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September 28, 2020

ELECTRONICALLY FILED

Hon. Nicholas G. Garaufis Senior United States District Judge U.S. District Court, Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11215

Re: U.S. v. Clare Bronfman 18-Crim.-204 (NGG)

Dear Judge Garaufis:

We represent Clare Bronfman. The undersigned respectfully writes, in anticipation of Wednesday's sentencing, to provide the Court with two additional important documents.

The first is a letter from Clare's immediate family, who ask the Court to consider a video link to the proceedings so they can participate remotely. While we are aware that there may be technological considerations with this request, Clare's mother and sister, in particular, are physically unable to attend because of quarantine restrictions associated with the COVID-19 pandemic and their travel into the United States from abroad. Given the unusual circumstances, we would respectfully request that the Court allow them to be present for this very important proceeding via video link, if that is possible. Clare's family very much wishes to be present in whatever way they can be.

The second document we submit separately under seal, as it contains Clare's medical records. Just four days ago, she was diagnosed by her doctor with a possibly serious liver ailment. Her alanine aminotransferase (ALT) is a level that is twice what her doctor would like and expect to see. Clare is scheduling medical follow-up visits, and we wanted the Court to be aware of this situation. We also believe that this puts Clare at heightened health risk, given the status of the pandemic in the New York area.

Respectfully submitted,

Duncan P. Levin, Esq. Counsel for Clare Bronfman

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All parties (via ECF)

cc: